

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	1:23-cr-00045-JPH-TAB
	)	
KAYVONN BAILEY,	)	
Defendant.	)	

**DEFENDANT'S MOTION TO CONTINUE  
PLEA AND SENTENCING HEARING**

Defendant Kayvonn Bailey, by counsel, Gwendolyn M. Beitz, and Indiana Federal Defenders, respectfully moves the Court to continue the plea and sentencing date presently set in this case, and in support states:

1. Plea and sentencing hearing in this matter is scheduled on August 6, 2024.
2. Counsel for the defendant will be out of town on the currently scheduled date and will not be available to attend the hearing.
3. Undersigned counsel has discussed this motion with Assistant United States Attorney Jeremy Fugate who does not object to a continuance.

**WHEREFORE**, Defendant Kayvonn Bailey requests that the present plea and sentencing date August 6, 2024, be vacated, and reset as the Court's calendar permits.

Respectfully submitted,

Gwendolyn M. Beitz  
Gwendolyn M. Beitz  
Indiana Federal Community Defenders, Inc.  
111 Monument Circle, Suite 3200  
Indianapolis, IN 46204  
317-383-3520

**CERTIFICATE OF SERVICE**

I certify that on July 18, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Gwendolyn M. Beitz  
Gwendolyn M. Beitz